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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES,

v.

WILLIAM HICKMAN, *et al.*

Defendants.

Crim. No.: 1:19-cr-00191 (RBK)

**NOTICE OF DEFENDANT
BRIAN PUGH'S
PRETRIAL MOTIONS**

TO: R. David Walk, Jr., Ass't U.S. Attorney
Christina O. Hud, Ass't U.S. Attorney
United States Attorney's Office
District of New Jersey
401 Market Street
Camden, NJ 08101

PLEASE TAKE NOTICE that Defendant Brian Pugh, by and through his attorneys, Baldassare & Mara, LLC, shall move before the Honorable Robert B. Kugler, United States District Judge, on a date and at a time to be determined by this Court, pursuant to Federal Rules of Criminal Procedure 12(b) and 41(h), for the entry of an Order to:

- a. dismiss Indictment No. 1:19-cr-191;
- b. sever Defendant Pugh's trial proceedings;
- c. furnish Defendant Pugh with a Bill of Particulars;
- d. transfer Venue; and
- e. disclose the Grand Jury transcripts in connection with the above matter.

PLEASE TAKE FURTHER NOTICE that in support of his pretrial motions, Defendant Brian Pugh relies upon the accompanying brief and any future filings in support his pretrial motions, and joins the pretrial motions of all co-defendants to the extent they are consistent with Defendant Pugh's arguments and applicable to Defendant Brian Pugh.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby requested.

BALDASSARE & MARA, LLC
Attorneys for Defendant Brian Pugh

Dated: May 11, 2020

By: /s/ Michael Baldassare
Michael Baldassare, Esq.